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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 20-CR-00249-RS (LB)
	)	
Plaintiff,	)	<b>STIPULATION AND [PROPOSED] ORDER</b>
	)	<b>DESIGNATING CLASSIFIED</b>
v.	)	<b>INFORMATION SECURITY OFFICER AND</b>
	)	<b>SETTING NEW DEADLINE FOR</b>
ROWLAND MARCUS ANDRADE,	)	<b>BRIEFING OF CIPA SCHEDULE</b>
	)	
Defendant.	)	
	)	

The parties to the above captioned matter hereby STIPULATE and agree as follows:

On July 13, 2024, the government filed notice that matters related to classified information have arisen in this case, and asked that the Court appoint a Classified Information Security Officer (CISO) and to set a briefing schedule related to the Classified Information Protection Act (CIPA). *Dkt. 322*. On July 25, 2024, defendant Andrade filed a response. *Dkt. 327*. At a status hearing on August 7, 2024, the Court ordered the parties to further meet and confer on the government's proposed CIPA briefing

1 scheduling order. *Dkt. 334*. The parties have met and conferred, and jointly stipulate and ask that the  
2 Court designate a CISO in this case at this time. Following the parties' consultation with the CISO,  
3 including regarding the timing for obtaining security clearances and other aspects of the CIPA process,  
4 the parties further stipulate and agree to meet and confer and, by no later than August 28, 2024, to file a  
5 stipulated schedule for the CIPA process. If the parties are unable to agree on a stipulated schedule,  
6 each party will file a brief, of no more than 4 pages in length, setting forth their respective positions on  
7 the appropriate schedule for the CIPA process.

8  
9 DATED: August 14, 2024

Respectfully submitted,

10 ISMAIL J. RAMSEY  
11 United States Attorney

12 /s/ David J. Ward  
13 DAVID J. WARD  
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18 Trial Attorney, National Security Division

19 /s/ Michael J. Shepard  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 20-CR-00249-RS
	)	
Plaintiff,	)	<b>STIPULATED [PROPOSED] ORDER</b>
	)	<b>DESIGNATING CLASSIFIED</b>
v.	)	<b>INFORMATION SECURITY OFFICER AND</b>
	)	<b>SETTING NEW DEADLINE FOR</b>
ROWLAND MARCUS ANDRADE,	)	<b>BRIEFING OF CIPA SCHEDULE</b>
	)	
Defendant.	)	

Having held a Status Conference in the case on August 7, 2024 to discuss the United States' Memorandum of Law Pursuant to the Classified Information Procedures Act, 18 U.S.C. App. 3, and Motion to Set Pretrial Conference and Designate Classified Information Security Officer, and Defendant Andrade's Response to that Motion; the Court finds:

That the United States has notified the Court that this case may involve classified information;

1 That federal law explicitly provides that federal courts must have security procedures for the  
2 handling of classified information. See Classified Information Procedures Act (“CIPA”), Pub. L. 96-456  
3 § 9, 94 Stat. 2025 (1980) (Statutory notes to § 9);

4 That the Attorney General or the Department of Justice Security Officer has recommended to the  
5 court a person qualified to serve as a Classified Information Security Officer (or “CISO”);

6 That the CISO is selected from the Litigation Security Group, Security and Emergency Planning  
7 Staff, Department of Justice to be detailed to the court to serve in a neutral capacity; and

8 IT IS HEREBY ORDERED that pursuant to Paragraph 2 of the Revised Security Procedures  
9 Established under to Pub L. 96-456, 94 Stat. 2025, by the Chief Justice of the United States and  
10 promulgated pursuant to Section 9 of the Classified Information Procedures Act, the Court HEREBY  
11 APPOINTS Winfield S. “Scooter” Slade, Supervisory Security Specialist, as the CISO in the above-  
12 captioned matter, for the protection of classified information that may arise in the above-captioned  
13 matter.

14 IT IS FURTHER ORDERED that the Court APPOINTS Jennifer H. Campbell, Daniel O.  
15 Hartenstine, Daniella M. Medel, Matthew W. Mullery, and Harry J. Rucker as alternate Court Security  
16 Officers in the above-captioned matter.

17 IT IS FURTHER ORDERED that within two weeks of the Court’s Order, the parties shall have  
18 another meet-and-confer and either file a stipulated schedule for the CIPA process or, alternatively, shall  
19 each file a brief, no more than 4 pages in length, setting forth their respective positions on the  
20 appropriate schedule for the CIPA process.

21 IT IS FURTHER ORDERED that nothing in this Order shall be construed to prevent the United  
22 States from continuing to move forward with the process it described at the August 7 Status Conference  
23 as working with the entity holder of the classified information to get the necessary approvals for making  
24 its initial CIPA section 4 filing.

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1 IT IS FURTHER ORDERED that, except as expressly set forth herein, nothing in this Order  
2 shall limit the contentions of either party in any later filing.

3  
4 **IT IS SO ORDERED.**

5  
6 Dated: \_\_\_\_\_

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8 HON. RICHARD SEEBORG  
9 United States Chief District Judge  
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